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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of
Proposal for Creation of the Low Power FM
(LPFM) Broadcast Service

FCC RM-9242

Comments of Harold H. Dunn

It is my understanding that when the Congress empowered the FCC to License and Regulate traffic in the airways, that this also included a mandate to the FCC to make maximum use of the airways.

Any Radio Engineer can verify that open FM frequencies exist in all areas of our country, with few exceptions, that could accommodate Low Power Broadcast Service. Therefor the FCC is not making maximum use of the airways.

The last study of the Low Power Broadcast Capabilities, by the FCC, was done in approx. 1968. Today there are inexpensive drift free transmitters that using modern filters and antennae can result in a consistent signal.

There has been, due to the associated operating costs, a consolidation of local high powered radio stations. In the Detroit Area there is only a handful.

Therefor, for small businesses to advertize on these stations is an expensive proposition. However, if LPFM stations were available local businesses could afford that type of advertizing.

I personally know of five people in Michigan who would like to operate a LPFM Station. But, do not wish to "Cross Swords" with the FCC , which at the present appears to be the only way.

In Summary, I feel the FCC should either:

1. License and Regulate all Commercial Broadcast Service including LPFM Stations.
2. Allow LPFM under 100 watt Stations without Licensing, but require advance notification and assist these stations if any interferences occur.



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